

EXHIBIT D

From: [Geman, Rachel](#)
To: [Burgoon, Emma Z.](#)
Cc: [OpenAICopyright; #C-M OPENAI COPYRIGHT LITIGATION - LW TEAM; KVP-OAI; ahurst@orrick.com; jared.briant@faegredrinker.com; lnajemy@orrick.com; ccarlillo@orrick.com; dijustice@orrick.com](#)
Subject: Re: [EXT] Authors Guild - Maya Lang
Date: Tuesday, June 11, 2024 9:59:00 AM
Attachments: [image001.png](#)

We do not agree to absent class member discovery.
Sent from my iPhone

On Jun 11, 2024, at 11:40 AM, Burgoon, Emma Z. <EBurgoon@mofo.com> wrote:

Rachel,

OpenAI does not oppose the withdrawal of Maya Lang as a named plaintiff, so long as you agree that her withdrawal will not affect our ability to obtain discovery from her.

Thanks,

Emma

Emma Z. Burgoon (she/her/hers)
Associate
[<mailto:EBurgoon@mofo.com>](mailto:EBurgoon@mofo.com)
T +1 (213) 892-5462
M +1 (213) 585-8668

<[image001.png](#)>

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